



Chief, Wireless Telecommunications Bureau
FCC
Washington, DC 20554

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RE: DOCKET NUMBER 07-16 - M2Z NETWORKS

Dear FCC,

It has come to my attention that on May 5, 2006, M2Z Networks filed an application with the FCC to lease 20 MHz of nationwide Spectrum at 2.155 GHz.

I have done a small amount of research on this topic and would like to say that I am OPPOSED to this application for a number of reasons.

1 - "Family Friendly" - M2Z is proposing a "family friendly" nationwide network. Who decides what is family friendly? Given the infinite use of the Internet and the obvious variety of opinion on what might be either "family" or "friendly", this is a spurious claim upon which to base a for profit nationwide network.

2 - "Free access" - Their "free" model must certainly include some advertising based component. What happens to competition if the competing ideas or products are deemed by the censors to be "unfriendly" to the current family of advertiser/censors.

3. - 5% payment of gross revenue - Radio spectrum is a valuable national resource that should not be given away for the promise of future payments with an unproven technology.

4. - Private ownership of single pervasive network - Ownership of a single band of frequency for such a large network without possibility of a competing network places too much power in the hands of the network owners. The FCC has obligations to the public to provide free and open competition for both the purchase of radio spectrum and provision of competing services.

5. Likelihood of success - No single cellular telephone company has been able to provide reliable 95% coverage of the United States. On the face of this application, it is ridiculous to assume a new start up venture will be able to achieve 95% coverage in any reasonable time. Their stated goals of initial 33% coverage might be achievable in certain metropolitan areas, but that is not nationwide coverage. To give away frequency based on the assertion of 95% coverage is a waste of taxpayer assets.

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